

EXHIBIT 6

Ex. B

Global Connect's Representative Claim Chart (Invalidity) For September 2004 GC Users Guide

Under the proper construction of the terms in the claims of the '122 Patent, the Global Connect system does not practice (and infringe) any of the '122 Patent claims. However, under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, the claims of the '122 Patent are invalid in view of the September 2004 GC Users Guide, as represented in the charts below.

<u>Claim 1 of '122 Patent</u>	<u>September 2004 GC Users Guide¹</u>
1. A system for processing an outbound call from a call originator to a call target, the system comprising:	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "[a] system for processing an outbound call from a call originator to a call target."</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (Voice Over Internet Protocol ("VoIP")). September 2004 GC Users Guide, at p. 5. A "call group" is a list of members that lists them by their "full name" and a "phone number" (to whom the system will originate and send to that member an outbound telephone call providing that member with the pre-recorded personalized voice message). September 2004 GC Users Guide, at pp. 5 & 14-17.</p>
[a] a database storing a plurality of outgoing telephone numbers	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "a database storing a plurality of outgoing telephone numbers."</p> <p>Specifically, September 2004 GC Users Guide discloses that the system includes a database to which users can import and save (or create and save) data files that include caller ID telephone numbers to be used. September 2004 GC Users Guide, at pp. 3 & 8-10.</p>
[b] an information processor controlled by the call originator and configured to process a trigger comprising a telephone number of the call target;	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "an information processor controlled by the call originator and configured to process a trigger comprising a telephone number of the call target."</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (VoIP). September 2004 GC Users Guide, at p. 5. The caller ID for each of the telephone calls made during the broadcast is controlled. September 2004 GC Users Guide, at pp. 5 & 14. For example, September 2004 GC Users Guide shows a local caller ID number (609-425-2875) during a broadcast to telephone calls made to Dean Ellison (609-203-3398), Marianne Pitman (609-487-6934), <i>etc.</i> September 2004 GC Users Guide, at p. 16.</p>

¹ September 2004 GC Users Guide is at Bates Nos. GC000610-GC000650.

<p>[c] access the database to select a replacement telephone number from the plurality of outgoing telephone numbers based on at least an area code of the telephone number of the call target;</p>	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “access the database to select a replacement telephone number from the plurality of outgoing telephone numbers based on at least an area code of the telephone number of the call target.”</p> <p>Specifically, September 2004 GC Users Guide discloses that the system can be used to take a call group of the broadcast and separated in into sub-call groups by area code. For example, the “Gus Sample” was split into two sub-call groups, one sub-call group having area codes 609 (“Gus Sample (Eastern)”) and the other sub-call group having area codes of 801 (“Gus Sample (Mountain)”). September 2004 GC Users Guide, at pp. 17-21. September 2004 GC Users Guide discloses that the system can be used to control the caller ID for each sub-call group. September 2004 GC Users Guide, at pp. 5 & 14. For example, the local caller ID number for calls made to the Gus Sample Eastern sub-call group during the broadcast can be set to have a caller ID with a 609 area code. <i>See e.g.</i>, September 2004 GC Users Guide, at pp. 14-16.</p>
<p>[d] modify caller identification data of the call originator to the selected replacement telephone number, the selected telephone number having at least an area code the same as an area code of the telephone number of the call target; and</p>	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “modify caller identification data of the call originator to the selected replacement telephone number, the selected telephone number having at least an area code the same as an area code of the telephone number of the call target.”</p> <p>Specifically, September 2004 GC Users Guide discloses that the system can be used to control the caller ID for each call group (and sub-call group). September 2004 GC Users Guide, at pp. 5 & 14. For example, the local caller ID number for calls made to the Gus Sample Eastern sub-call group during the broadcast can be set to have a caller ID with a 609 area code. <i>See e.g.</i>, September 2004 GC Users Guide, at pp. 14-16. September 2004 GC Users Guide discloses that the system sets the caller ID for that each particular telephone call to a member of the calling group at the time that call is originated. September 2004 GC Users Guide, at p. 16.</p>
<p>[e] transmit the modified caller identification data of the call originator to the call target</p>	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “transmit the modified caller identification data of the call originator to the call target.”</p> <p>Specifically, September 2004 GC Users Guide discloses that a broadcast can be scheduled by creating a broadcast (which includes creating a pre-recorded message, selecting one or more call groups (such as the two sub-call groups) to whom the broadcast is to be made, and then setting the time for the broadcast to occur). September 2004 GC Users Guide, at pp. 22-29, 33-34, 37-38. September 2004 GC Users Guide discloses that, during the broadcast, the system sets the caller ID for that each particular telephone call to a member of the calling group at the time that call is originated; this is the “Number that will be displayed on the customer’s [i.e., that member’s] caller ID.” September 2004 GC Users Guide, at p. 16.</p>

<u>Claim 2 of ‘122 Patent</u>	<u>September 2004 GC Users Guide</u>
<p>2. The system of claim 1, wherein</p>	<p><i>See</i> chart for Claim 1 above, which is incorporated in this response.</p>

the system is embedded in one of a carrier network, a private branch exchange, and a communications device.	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "the system is embedded in one of a carrier network, a private branch exchange, and a communications device."</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (VoIP). September 2004 GC Users Guide, at p. 5. The broadcast is made by Global Connect's telephone network to call group members via the "Telephone Company." September 2004 GC Users Guide, at p. 5.</p>
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<u>Claim 3 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
3. The system of claim 2, wherein	<i>See</i> charts for Claims 1 and 2 above, which are incorporated in this response.
the communications device is one of a telephone, a VoIP phone, and a VoIP soft phone.	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "the communications device is one of a telephone, a VoIP phone, and a VoIP soft phone."</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (VoIP). September 2004 GC Users Guide, at p. 5.</p>

<u>Claim 4 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
4. The system of claim 1, wherein	<i>See</i> chart for Claim 1 above, which is incorporated in this response.
the system is embedded in one of a corporate phone system, a predictive dialer, and a call distribution system.	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "the system is embedded in one of a corporate phone system, a predictive dialer, and a call distribution system."</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (VoIP). September 2004 GC Users Guide, at p. 5. The broadcast is made by Global Connect's telephone network to call group members via the "Telephone Company." September 2004 GC Users Guide, at p. 5.</p>

<u>Claim 5 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
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5. The system of claim 1, wherein	<i>See</i> chart for Claim 1 above, which is incorporated in this response.
the selected replacement telephone number has an area code and a prefix the same as an area code and a prefix of the telephone number of the call target.	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "the selected replacement telephone number has an area code and a prefix the same as an area code and a prefix of the telephone number of the call target."</p> <p>Specifically, September 2004 GC Users Guide discloses that the system can be used to control the caller ID for each call group (and sub-call group). September 2004 GC Users Guide, at pp. 5 & 14. For example, the local caller ID number for calls made to the Gus Sample Eastern sub-call group during the broadcast can be set to have a caller ID with a 609 area code. <i>See e.g.</i>, September 2004 GC Users Guide, at pp. 14-16. September 2004 GC Users Guide discloses that the system sets the caller ID for that each particular telephone call to a member of the calling group at the time that call is originated. September 2004 GC Users Guide, at p. 16.</p>

<u>Claim 6 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
6. A computer for processing a call originated by a call originator to a call target, the computer comprising:	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "[a] computer for processing a call originated by a call originator to a call target."</p> <p>Global Connect incorporates its response to the preamble of Claim 1 in the above chart herein.</p> <p>Furthermore, September 2004 GC Users Guide discloses that the system includes "Global Connect servers," which is one or more computers. September 2004 GC Users Guide, at p. 5.</p>
[a] memory having at least one region for storing computer executable program code; and	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "memory having at least one region for storing computer executable program code."</p> <p>Specifically, September 2004 GC Users Guide discloses that the system includes "Global Connect servers," which contain a computer having memory for storing a computer executable program code. September 2004 GC Users Guide, at p. 5. Throughout the September 2004 GC Users Guide, September 2004 GC Users Guide further discloses how to use the program that is saved on the Global Connect servers. <i>See, e.g.</i>, September 2004 GC Users Guide, at pp. 8-41.</p>
[b] processor for executing the program code stored in the memory, wherein the program code comprises:	<p>Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "processor for executing the program code stored in the memory."</p> <p>Specifically, September 2004 GC Users Guide discloses that the system includes "Global Connect servers," which contain a computer having a processor for executing the computer executable program code. September 2004 GC Users Guide, at p. 5. Throughout the September 2004 GC Users Guide, September 2004 GC Users Guide further discloses how to use the program</p>

	that is saved on the Global Connect servers. <i>See, e.g.</i> , September 2004 GC Users Guide, at pp. 8-41.
[i] code for processing a telephone number of the call target;	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “processor for executing the program code stored in the memory.”</p> <p>Specifically, September 2004 GC Users Guide discloses a web-based voice messaging system that broadcasts pre-recorded personalized voice messages from users to designated telephone numbers (of one or more call groups) over the Internet (VoIP”). September 2004 GC Users Guide, at p. 5.</p> <p>September 2004 GC Users Guide discloses that the system includes “Global Connect servers,” which contain a computer having a processor for executing the computer executable program code. September 2004 GC Users Guide, at p. 5. Throughout the September 2004 GC Users Guide, September 2004 GC Users Guide further discloses how to use the program that is saved on the Global Connect servers. <i>See, e.g.</i>, September 2004 GC Users Guide, at pp. 8-41. This includes creating call groups containing telephone numbers to whom the broadcast is to be made. September 2004 GC Users Guide, at pp. 8-21.</p>
[ii] code for accessing a database storing a plurality of outgoing telephone numbers;	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “code for accessing a database storing a plurality of outgoing telephone numbers.”</p> <p>Global Connect incorporates its response to the element 1[b] of Claim 1 in the above chart herein.</p>
[iii] code for selecting a replacement telephone number from the plurality of outgoing telephone numbers based on at least a portion of the telephone number of the call target;	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “code for selecting a replacement telephone number from the plurality of outgoing telephone numbers based on at least a portion of the telephone number of the call target.”</p> <p>Global Connect incorporates its response to the element 1[a] of Claim 1 in the above chart herein.</p>
[iv] code for modifying caller identification data of the call originator to the selected replacement telephone number, the selected replacement telephone number having an area code from a geographic region the same as a geographic region of an area code of the telephone number of the call target; and	<p>Under Plaintiff’s apparent construction of the terms in the claims of the ‘122 Patent, September 2004 GC Users Guide discloses “code for modifying caller identification data of the call originator to the selected replacement telephone number, the selected replacement telephone number having an area code from a geographic region the same as a geographic region of an area code of the telephone number of the call target.”</p> <p>Global Connect incorporates its response to the element 1[d] of Claim 1 in the above chart herein.</p>

[v] code for transmitting the modified caller identification data of the call originator to the call target.	Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "code for transmitting the modified caller identification data of the call originator to the call target." Global Connect incorporates its response to the element 1[e] of Claim 1 in the above chart herein.
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<u>Claim 7 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
7. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the selected replacement telephone number has at least an area code the same as an area code of the telephone number of the call target.	Global Connect incorporates its response to the element 1[d] of Claim 1 in the above chart herein.

<u>Claim 8 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
8. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the geographic region is one of a state and other municipality smaller than a state.	Global Connect incorporates its response to the element 1[d] of Claim 1 in the above chart herein.

<u>Claim 9 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
9. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the area code of the selected	Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide

replacement telephone number is associated with a state different from a state associated with the area code of the telephone number of the call target.	discloses “the area code of the selected replacement telephone number is associated with a state different from a state associated with the area code of the telephone number of the call target.” Specifically, September 2004 GC Users Guide discloses that any caller ID can be selected for each calling group of a broadcast. September 2004 GC Users Guide, at p. 5. This caller ID could be any area code, including an area code associated with a state different from a state associated with the area code of the telephone number of member to whom a call is made during the broadcast. September 2004 GC Users Guide, at p. 5.
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<u>Claim 10 of ‘122 Patent</u>	<u>September 2004 GC Users Guide</u>
10. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the selected replacement telephone number has an area code and a prefix the same as an area code and prefix of the telephone number of the call target.	Global Connect incorporates its response to Claim 5 in the above chart herein.

<u>Claim 11 of ‘122 Patent</u>	<u>September 2004 GC Users Guide</u>
11. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the area code and prefix of the selected replacement telephone number corresponds to a geographic region the same as the area code and prefix of the telephone number of the call target.	Global Connect incorporates its response to Claim 5 in the above chart herein.

<u>Claim 12 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
12. The computer of claim 11, wherein	<i>See</i> charts for Claims 6 and 11 above, which are incorporated in this response.
the geographic region is one of a state and other municipality smaller than a state.	Global Connect incorporates its response to Claim 8 in the above chart herein.

<u>Claim 13 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
13. The computer of claim 6, wherein	<i>See</i> charts for Claims 6 and 13 above, which are incorporated in this response.
the computer is embedded in one of a carrier network, a private branch exchange, and a communications device.	Global Connect incorporates its response to Claim 2 in the above chart herein.

<u>Claim 14 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
14. The computer of claim 13, wherein	<i>See</i> charts for Claims 6 and 13 above, which are incorporated in this response.
the communications device is one of a telephone, a VoIP phone, and a VoIP soft phone.	Global Connect incorporates its response to Claim 3 in the above chart herein.

<u>Claim 15 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
15. The computer of claim 6, wherein	<i>See</i> chart for Claim 6 above, which is incorporated in this response.
the computer is embedded in one of a corporate phone system, a predictive dialer, and a call distribution system.	Global Connect incorporates its response to Claim 4 in the above chart herein.

<u>Claim 16 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
16. A computer implemented method for processing a call originated by a call originator to a call target comprising:	Under Plaintiff's apparent construction of the terms in the claims of the '122 Patent, September 2004 GC Users Guide discloses "[a] computer implemented method for processing a call originated by a call originator to a call target." Global Connect incorporates its response to the preamble of Claims 1 and 6 in the above charts herein.
[a] processing a trigger in the form of a telephone number of the call target;	Global Connect incorporates its response to the element 1[b] of Claim 1 in the above chart herein.
[b] accessing a database storing a plurality of outgoing telephone numbers;	Global Connect incorporates its response to the element 1[a] of Claim 1 in the above chart herein.
[c] selecting a replacement telephone number from the plurality of outgoing telephone numbers based on at least a portion of the telephone number of the call target;	Global Connect incorporates its response to the element 1[c] of Claim 1 in the above chart herein.
[d] modifying caller identification data of the call originator to the selected replacement telephone	Global Connect incorporates its response to the element 1[d] of Claim 1 in the above chart herein.

number, the selected replacement telephone number having an area code from a geographic region the same as a geographic region of an area code of the telephone number of the call target; and	
transmitting the modified caller identification data of the call originator to the call target.	Global Connect incorporates its response to the element 1[e] of Claim 1 in the above chart herein.

<u>Claim 17 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
17. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the selected replacement telephone number has at least an area code the same as an area code of the telephone number of the call target.	Global Connect incorporates its response to the element 1[d] of Claim 1 in the above chart herein.

<u>Claim 18 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
18. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the geographic region is one of a state and other municipality smaller than a state.	Global Connect incorporates its response to Claim 8 in the above chart herein.

<u>Claim 19 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
19. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the selected replacement telephone number has an area code and a prefix the same as an area code and a prefix of the telephone number of the call target.	Global Connect incorporates its response to Claim 5 in the above chart herein.

<u>Claim 20 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
20. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the area code and prefix of the selected replacement telephone number corresponds to a geographic region the same as an area code and a prefix of the telephone number of the call target.	Global Connect incorporates its response to Claim 5 in the above chart herein.

<u>Claim 21 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
21. The method of claim 20, wherein	<i>See</i> charts for Claims 16 and 20 above, which are incorporated in this response.
the geographic region is one of a state and other municipality smaller than a	Global Connect incorporates its response to Claim 8 in the above chart herein.

state.	
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<u>Claim 22 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
22. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the method is performed in one of a carrier network, a private branch exchange, and a communications device.	Global Connect incorporates its response to Claim 2 in the above chart herein.

<u>Claim 23 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
23. The method of claim 22, wherein	<i>See</i> charts for Claims 16 and 22 above, which are incorporated in this response.
the communications device is one of a telephone, a VoIP phone, and a VoIP soft phone.	Global Connect incorporates its response to Claim 3 in the above chart herein.

<u>Claim 24 of '122 Patent</u>	<u>September 2004 GC Users Guide</u>
24. The method of claim 16, wherein	<i>See</i> chart for Claim 16 above, which is incorporated in this response.
the method is performed in one of a corporate phone system, a predictive dialer, and a call distribution system.	Global Connect incorporates its response to Claim 4 in the above chart herein.